

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO. 04 11572 JLT

SUSAN COONEY,)
Plaintiff)
v.)
)
SAYBROOK GRADUATE SCHOOL AND)
RESEARCH CENTER, and)
MAUREEN O'HARA, Individually)
Defendants)

PROPOSED ORDER

After consideration of Plaintiff's Motion to Compel Defendants Saybrook and O'Hara to Submit to Further Discovery, the Court hereby orders as follows:

1. Saybrook and O'Hara are ordered, on or before May 1, 2006, to produce additional documents, as described below.
2. Defendants shall produce Alan Vaughan's licensing information bulletin, which appears on a restricted area of Saybrook's web site, and all other Saybrook e-mails, memoranda, reports, research, and notes regarding licensing standards or obstacles in Massachusetts or other jurisdictions.
3. Defendants shall produce all e-mail, letters, and other documents concerning written or electronic communications by or between Thomas Greening, Ilene Serlin, Alan Vaughan, Eugene Taylor, Maureen O'Hara, Arthur Bohart, Kathleen Clark, William Bruff, and any other Saybrook faculty, staff, or officers regarding licensing standards or obstacles in Massachusetts, and licensing issues encountered by John Burke, Richard Francis, or other Massachusetts students.

4. Defendants shall make further search for any documents related to their participation in the Consortium for Diversified Psychology Programs ("CDPP") and other similar programs from 1990 to the present. Defendants shall also produce all documents related to any Saybrook initiatives to monitor or to influence licensure standards for psychologists in any state.
5. Defendants shall produce any writings or research by Maureen O'Hara or other Saybrook faculty, for the period of 1990 to the present, regarding licensing standards or restrictions in Massachusetts or other jurisdictions.
6. Notwithstanding the provisions of any confidentiality or settlement agreements between O'Hara and Saybrook, O'Hara shall be ordered to submit to further deposition questioning for up to three hours related to the following subjects: (1) her resignation and/or termination from Saybrook; (2) policy differences between O'Hara and Saybrook's board; (3) any newly produced or discovered documents of further communication between O'Hara and Saybrook faculty, administrators, or staff regarding licensing standards or licensing obstacles; (4) any newly produced or discovered documents of O'Hara's writings or research on licensing standards or obstacles.; and (5) any newly produced or discovered documents regarding O'Hara's communications with the Consortium of Diversified Psychology Programs.

By the Court,

Joseph L. Tauro, District Judge

Dated: _____, 2006